

**SALAMON, GRUBER, BLAYMORE & STRENGER, P.C.**

MICHAEL D. BLAYMORE  
 RUSSELL B. BLAYMORE  
 LEONARD GRETAH  
 CRAIG M. GRUBER  
 DAVID GRUBER  
 SCOTT J. MANDEL  
 ANTHONY PRISCO  
 SANFORD STRENGER  
 LOUIS W. ZAPATA

SUITE 101  
 97 POWERHOUSE ROAD  
 ROSLYN HEIGHTS, N. Y. 11577-2016  
 (516) 625-1700  
 TELECOPIER NO. (516) 625-1795  
 WWW.SGBBLAW.COM

**FILE COPY**

Writer's Direct E-Mail:  
 aprisco@sgnblaw.com

August 21 2008

**ORIGINAL FILED BY ECF  
 VIA FACSIMILE**

Hon. Stephen C. Robinson  
 United States District Court  
 Southern District of New York  
 US Courthouse  
 300 Quarropas Street  
 White Plains, NY 10601

**FILED**

Re: Cadles of Grassy Meadows II, LLC v. Kathryn Lapidus and  
Raquette Lake Camps, Inc.  
 Case No.: 08 Civ. 6371 (SR)

Dear Judge Robinson:

We represent the Defendants Kathryn Lapidus and Raquette Lake Camps (the "Camp") in the above entitled action and we are requesting an extension for the Defendants to move or answer until September 29, 2008.<sup>1</sup> This is the first request for an extension. I telephoned Plaintiff's counsel to request consent, however, Mr. Vlock informed me that I must speak with Mr. Giordano, who is handling the matter. Mr. Giordano is out of the office until Monday. As both myself and the partner in charge of this action have vacation scheduled next week, we deemed it appropriate to request an extension from the Court.

Ms. Lapidus, the owner of Raquette Lake Camps, was upstate running the Camp until recently and we have yet to confer about the matter. Additionally, aside from upcoming vacation, we also are preparing for trial in mid-September. We, therefore, respectfully request a thirty (30) day adjournment so that we can adequately respond to the Complaint.

Respectfully submitted,

s/

Anthony F. Prisco (AP-9633)

AFP:tv

cc: Steven Giordano, Esq. (Via Facsimile)  
 Stephen Vlock, Esq. (Via Facsimile)

ap\G:\APRISCO\Cadles v. Lapidus(USDC)\Correspondence\Robinson (Hon.)-ltr-8-21-08.wpd

**FILED**

<sup>1</sup>Kathryn Lapidus was served personally at the Camp on August 7, 2008. While PACER indicates that the Camp was served through the Secretary of State on July 18, 2008, which would have been mailed to an address on file for the Camp in Westchester County, Kathryn was upstate running the Camp at this time and I have no knowledge that she ever received this Complaint.

**APPLICATION GRANTED**

*Stephen C. Robinson*  
**HON. STEPHEN C. ROBINSON**

8/25/08